

G. Robert Gage, Jr. (NY Bar No. 1901412)
Joseph B. Evans (NY Bar No. 5221775)
Gage Spencer & Fleming LLP
410 Park Avenue, Suite 900
New York, New York 10022
Tel: (212) 768-4900
Fax: (212) 768-3629
grgage@gagespencer.com
jevans@gagespencer.com

(Admitted *Pro Hac Vice*)

David G. Harrison (VSB 17590)
The Harrison Firm, P.C.
5305 Medmont Circle
Roanoke, Virginia 24018-1120
Tel: (540) 777-7100
Fax: (540) 777-7101
david@harrisonfirm.us

Attorneys for Plaintiff John Doe

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

John Doe,

Plaintiff,

-against-

Washington and Lee University,

Defendant.

**Civil Action No.:
6:14-cv-0052-NKM**

Motion to Compel

PLAINTIFFS' MOTION TO COMPEL PRODUCTION

Plaintiff John Doe moves to compel production of documents withheld on grounds of attorney-client privilege asserted by Defendant Washington and Lee University ("W&L") in connection with the above-referenced matter. Pursuant to Rule 37 of the Federal Rules of Civil Procedure, Plaintiff John Doe, though undersigned counsel, respectfully moves for an order compelling Defendant Washington and Lee University ("W&L") to produce those materials which are otherwise responsive to Plaintiffs' prior First and Second Document Requests and of critical relevance and importance to the central issues presented in this litigation.

In support of this Motion Plaintiffs incorporate their memorandum in support.

WHEREFORE, Plaintiffs' request that the Court order Defendant W&L to produce materials responsive to Plaintiffs' Document Requests.

Dated: December 30, 2015

/s/ _____
G. Robert Gage, Jr.
Joseph Evans
Gage Spencer & Fleming LLP
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New York, New York 10022
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grgage@gagespencer.com
jevans@gagespencer.com
(Admitted Pro Hac Vice)

/s/ _____
David G. Harrison, Esquire (VSB #17590)
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5305 Medmont Circle
Roanoke, Virginia 24018-1120
(540) 777-7100
david@harrisonfirm.us

Attorneys for Plaintiff John Doe